

Exhibit A

From: [James Allen](#)
To: [Joseph A. Bellanca](#); [Daniel D. Quick](#); [Eddrey Butts](#); [Peter Doyle](#)
Cc: [Matthew J. Turchyn](#); [Howard Hertz](#)
Subject: RE: 4:22-cv-11009-FKB-DRG - Worrell v. Thang, Inc. et al
Date: Thursday, October 10, 2024 2:00:57 PM
Attachments: [2024-10-05 Westbound Records, Inc.2.pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[2024-10-05 Westbound Records, Inc..pdf](#)
[2024-10-05 Eastbound Records, Inc2.pdf](#)
[2024-10-05 Eastbound Records, Inc.pdf](#)
[2024-10-05 Bridgeport Music, Inc.pdf](#)
[2024-10-05 Bridgeport Music, Inc2.pdf](#)
[2024-10-05 Armen Boladian.pdf](#)
[2024-10-05 Joel David Bacow \(Joel Martin\)2.pdf](#)
[2024-10-05 Joel David Bacow \(Joel Martin\).pdf](#)
[2024-10-05 Sarah Catlett2.pdf](#)
[2024-10-05 Sarah Catlett.pdf](#)
[Allen Letter 9.23.24.pdf](#)

This is what we have received from our process server who is racking up charges for multiple trips to the same location where service was accomplished for the original set of document subpoenas to which Mr. Bellanca responded with a letter to me saying that his client would not cooperate with producing documents or testimony. See attached. This is the first time in nearly 30 years that I have had a represented non-party refuse to accept service of a valid subpoena that his client has clearly evaded and is nakedly defying. I am all for allowing every courtesy to counsel that needs to get up to speed on a matter, clear scheduling conflicts, or respond to personal emergencies. But this isn't that situation. Unfortunately, the deponents have a long history of this sort of behavior and should not be rewarded with more delay than has already occurred.

From: James Allen
Sent: Thursday, October 10, 2024 12:26 PM
To: Joseph A. Bellanca <jbellanca@hertzschr.com>; Daniel D. Quick <DQuick@dickinson-wright.com>; Eddrey Butts <Eddrey_Butts@mied.uscourts.gov>; Peter Doyle <Peter.Doyle@sbdetroit.com>
Cc: Matthew J. Turchyn <mturchyn@hertzschr.com>; Howard Hertz <hhertz@hertzschr.com>
Subject: RE: 4:22-cv-11009-FKB-DRG - Worrell v. Thang, Inc. et al

Good morning:

Service of the initial subpoenas was accomplished weeks ago and Mr. Bellanca sent correspondence defying the subpoenas as opposed to following Rule 30 and moving for protective order. There were subpoenas for testimony that followed and Mr. Boladian's office is evading service. Mr. Bellanca, however, has received courtesy copies of all requests.

This is a blatant attempt to run out the clock on discovery. Mr. Bellanca, the person to be charged by his client with responsibility for responding to the subpoenas or motions to compel compliance with them has everything he needs to give informed and complete answers to any inquiries the court may have regarding his refusal to comply with validly issued subpoenas for vitally important and directly

relevant information to the very heart of this case.

I am asking that the Court not adjourn tomorrow's scheduled call and that Mr. Bellanca direct his client to cease from evading service of the remaining subpoenas.

Jim Allen

From: Joseph A. Bellanca <jbellanca@hertzschram.com>

Sent: Thursday, October 10, 2024 11:30 AM

To: James Allen <james.allen@sbdetroit.com>; Daniel D. Quick <DQuick@dickinson-wright.com>; Eddrey Butts <Eddrey_Butts@mied.uscourts.gov>; Peter Doyle <Peter.Doyle@sbdetroit.com>

Cc: Matthew J. Turchyn <mturchyn@hertzschram.com>; Howard Hertz <hhertz@hertzschram.com>

Subject: RE: 4:22-cv-11009-FKB-DRG - Worrell v. Thang, Inc. et al

Good morning Eddrey:

We have not been able to confirm that the subpoenas at issue have been properly served. Additionally, I have a scheduling conflict where I will be out of pocket all day on Friday and unable to attend the telephonic status conference. Would it be possible to reschedule the status conference until next week?

Thank you.

Joe Bellanca

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From: James Allen <james.allen@sbdetroit.com>
Sent: Thursday, October 3, 2024 1:52 PM
To: Daniel D. Quick <DQuick@dickinson-wright.com>; Eddrey Butts <Eddrey_Butts@mied.uscourts.gov>; Peter Doyle <Peter.Doyle@sbdetroit.com>; Joseph A. Bellanca <jbellanca@hertzschram.com>
Subject: RE: 4:22-cv-11009-FKB-DRG - Worrell v. Thang, Inc. et al

****EXTERNAL SENDER****

Dan:

I don't like splitting hairs and I am not pushing to disturb another lawyer's well-earned trip, but I was not, to my recollection, "advised" or otherwise informed of your travel plans. If I missed that disclosure during our status conference or subsequent exchanges, I do apologize for any intrusion on your vacation time. We obviously won't ask to do anything with the requested conference until you return, but would appreciate some early availability once you've settled back in from your trip as this is a matter of some importance to us. Again, I am deleting the attorneys for dismissed record companies from the thread and adding Mr. Bellanca so he is advised of the discussions and can be included in any scheduling logistics. Enjoy the remainder of your trip.

Safe travels---

Jim Allen

From: Daniel D. Quick <DQuick@dickinson-wright.com>
Sent: Thursday, October 3, 2024 3:21 AM
To: Eddrey Butts <Eddrey_Butts@mied.uscourts.gov>; James Allen <james.allen@sbdetroit.com>; 'dep@wwrplaw.com' <dep@wwrplaw.com>; 'bslotnick@loeb.com' <bslotnick@loeb.com>; 'jmeddy@loeb.com' <jmeddy@loeb.com>; Peter Doyle <Peter.Doyle@sbdetroit.com>
Subject: Re: 4:22-cv-11009-FKB-DRG - Worrell v. Thang, Inc. et al

Eddrey: as defense counsel was advised I am out of country through 10/9. Would appreciate a date thereafter.



[Daniel D. Quick](mailto:DQuick@dickinsonwright.com)

Member

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2600 West Big Beaver, Suite 300, Troy MI, 48084

From: Eddrey Butts <Eddrey_Butts@mied.uscourts.gov>
Sent: Wednesday, October 2, 2024 8:15:49 PM
To: Daniel D. Quick <DQuick@dickinson-wright.com>; 'james.allen@sbdetroit.com' <james.allen@sbdetroit.com>; 'dep@wwrplaw.com' <dep@wwrplaw.com>; 'bslotnick@loeb.com' <bslotnick@loeb.com>; 'jmeddy@loeb.com' <jmeddy@loeb.com>; 'peter.doyle@sbdetroit.com' <peter.doyle@sbdetroit.com>

Subject: 4:22-cv-11009-FKB-DRG - Worrell v. Thang, Inc. et al

Good afternoon,

Are the parties available on 10/4/24 at 11:00am to hold a brief call with Judge Grand regarding this case?



Eddrey O. Butts
Case Manager to the Honorable David R. Grand
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(734) 741-2484

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